1 BEFORE THE TENNESSEE REGULATORY AUTHORITY	1 (The aforementioned cause came on to be
2 IN RE:	2 heard on Friday, May 8, 1998, beginning at
3 BELLSOUTH TELECOMMUNICATIONS, INC.'S) DOCKET NO.	3 approximately 10:50 a.m., before Chairman Lynn Greer,
ENTRY INTO LONG DISTANCE (INTERLATA)) 97-00309	4 Director Sara Kyle, and Director Melvin Malone, when
4 SERVICE IN TENNESSEE PURSUANT TO)	5 the following proceedings were had, co-wit.)
SECTION 271 OF THE TELECOMMUNICATIONS)	6
5 ACT OF 1996)	7 CHAIRMAN GREER: Mr. Hopkins, your
6	8 witness.
7 TRANSCRIPT OF PROCEEDINGS	9 MR. LAMOUREUX: Before Mr. Hopkins
8 Friday, May 8, 1998	10 starts, I just have one little question I'd like to
VOLUME IV B	11 raise, if I may.
9	12 The chart that BellSouth handed out
10 APPEARANCES:	13 this morning, I noticed that it not only has a column
11 For BellSouth: Mr. Guy M. Hicks	14 for what the FCC decided, but also what BellSouth's
Mr. William J. Ellenberg, II	15 response for that FCC decision for each paragraph is.
12	16 And while I don't object to that, I think it would be
For AT&T: Mr. James P. Lamoureux	17 appropriate for us to have an opportunity to put a
13	18 column for our position on each of those paragraphs as
For MCI: Mr. Richard D. Melson	19 well, to make this a complete document.
14 Mr. Dulaney L. O'Roark	20 CHAIRMAN GREER: Are you talking about
15 For TCG MidSouth, Inc: Ms. D. Billye Sanders	21 this one?
16 For Consumer Advocate: Mr. Vance L. Broemel	22 MR. LAMOUREUX: Yes, sir. It was my
17 For ACSI, SECA, and	23 understanding that what Director Malone asked for was a
Brooks: Mr. Henry Walker	24 summary of the FCC's decision on BellSouth's OSS, which
18	25 I think this has. It also has BellSouth's response to
For Sprint: Ms. Monica Barone	
19 Mr. William R. Atkinson	
20 For Intermedia, LCI,	
and WorldCom: Mr. H. LaDon Baltimore	
21	
For NEXTLINK: Ms. Dana Shaffer	
22 Mr. Henry C. Campen, Jr.	
23 For BellSouth	
Long Distance Mr. Guilford F. Thornton, Jr.	
24	
Reported by:	
25 Donna J. McWhorter, RPR	

1 INDEX	1 each of those issues. And to make it a complete
2 (May 8, 1998 - Volume IV B)	2 document, I think it would be appropriate to have a
3	3 column as to what our position on each of those issues
WITNESSES: PAGES:	4 is as well, and any other party as well.
4	5 DIRECTOR MALONE: I think BellSouth
WILLIAM N. STACY:	6 prepared exactly what I asked for. I asked for the
5 Cross-Examination by Mr. Hopkins 70-115	7 FCC's position, and then I asked for what BellSouth had
6	8 done subsequent to when the FCC took the position to
7	9 resolve it. And so they've presented what I asked for.
8 EXHIBITS	10 If you are asking, in addition to
9	11 that, to be able to supplement this with -- I think
NUMBER DESCRIPTION PAGE	12 BellSouth did what I asked them to do, and I think
10	13 cross-examination can take care of where you're aiming.
32 FCC Document 76	14 MR. LAMOUREUX: I didn't recall the
11	15 second part of that. I apologize.
33 AT&T's First Data Request	16 Mr. Hopkins will be doing the
12 Item No. 12 98	17 cross-examination of Mr. Stacy.
13	18 DIRECTOR KYLE: I've got to make my
14	19 record clear, for when I make my status report, that I
15	20 would be in favor of the other parties' positions being
16	21 included.
17	22 DIRECTOR MALONE: Then, in light of
18	23 Director Kyle's suggestion, which was clearly not made
19	24 last night, I have no problems, if Mr. Ellenberg
20	25 doesn't have any problem.
21	
22	
23	
24	
25	

1 of integration'?
2 A.   You'll have to give me both types before I
3 can --
4 Q.   And the other type would be a machine-to-
5 machine interface that integrates the two systems
6 between, let's say, a CLEC and an OSS and BellSouth?
7 A.   No. I can't agree with that. Let me try
8 my definition and see if we can be common.
9   There are two words that are being used in
10 the FCC's discussions now and beginning to be used in
11 the South Carolina-Louisiana orders, and they're trying
12 to qualify them and make them technically accurate.
13   There are a group of interfaces that are
14 referred to as integratable. And you will hear the
15 words integratable and machine to machine and
16 application to application, and those have become
17 synonyms. And what that means is, a computer can get
18 information from another computer in such a manner that
19 the recipient can then integrate that data into some
20 other program. So those are integratable.
21   There is another term called integrated,
22 which means that the integration has been done. So to
23 take those through, BellSouth provides, as I showed you
24 yesterday, integratable accesses to both preordering
25 and ordering and the CLECs can use that data to build

1 correct?
2 A.   As a factual matter, that is correct. We
3 provide interfaces that are integratable in those
4 fashions.
5 Q.   And is it correct that the EDI ordering
6 interface is the single ordering interface for resale
7 upon which BellSouth relies to satisfy its obligations
8 under the Act?
9 A.   I cannot say that it is the single
10 interface. It is the interface that provides the full
11 functionality we rely on. We also provide LENS, which
12 fulfills some requirements under the Act. But the EDI
13 interface is the one that fulfills all of the
14 requirements under the Act. So with that explanation,
15 yes.
16 Q.   And I believe you said in earlier testimony
17 here that BellSouth claims there is three methods to
18 provide integratable interfaces, that is LENS CGI,
19 EC-Lite, and, I believe, API?
20 A.   For preordering?
21 Q.   No. For -- yes, for preordering and
22 ordering.
23 A.   No. Let me --
24 Q.   Well, let me rephrase. To be able to
25 integrate preordering and ordering functions, BellSouth

1 an integrated preordering and ordering system.
2   And I apologize, but that's the
3 distinction, the way I have been using the words for at
4 least the last four or five months specifically.
5 Q.   I'll use your terms. I don't think we have
6 a disagreement. So, for example, LENS would be
7 integrated, the LENS firm mode would be integrated?
8 A.   That's correct.
9 Q.   And you claim that LENS CGI would be
10 integratable?
11 A.   That's correct.
12 Q.   Okay. Now, RNS and SONGS are integrated;
13 is that correct?
14 A.   That's correct.
15 Q.   Now, is that a function of RNS, a
16 functionality of RNS?
17 A.   Yes.
18 Q.   That you agree you have to provide
19 nondiscriminatory access to integrated or integratable
20 function?
21 A.   Integratable. That's the distinction.
22 Q.   Okay. Well, if something is -- never mind.
23   As a factual matter, BellSouth does not
24 provide CLECs with a preordering interface that is
25 integrated with EDI ordering interface; is that

1 says you can use LENS CGI, EC-Lite, and, in the future,
2 API?
3 A.   That's correct. Those three systems, with
4 the future characterization, provide the preordering
5 half of that equation.
6 Q.   Now I want to talk about the first one that
7 we mentioned, the LENS CGI spec.
8 A.   Yes.
9 Q.   On page 5 of your testimony, your rebuttal
10 testimony --
11 A.   I have that.
12 Q.   -- you disagree with Mr. Bradbury's
13 testimony that the LENS CGI spec is not current; is
14 that true?
15 A.   Yes. At the time I wrote this testimony,
16 the specification -- I disagree with his testimony,
17 yes, sir.
18 Q.   But in the same breath, you say that
19 BellSouth is currently updating the CGI spec to reflect
20 OBF EDI standards compliance?
21 A.   Yes.
22 Q.   So I guess I don't understand how you can
23 update something that's already current.
24 A.   You update it because it changes. At the
25 time Mr. Bradbury wrote his testimony, the spec was

1 current. Between then and the time I filed my
2 testimony, we started the update and then we completed
3 the update. So it's just a matter of timing. It's
4 current, but it's not static, I guess is the way I put
5 that. We kind of discussed that earlier.
6 Q.   But right now the LENS CGI spec that is
7 available to CLECs, if we take a snapshot today, that's
8 not current?
9 A.   No; if we take a snapshot today, the spec
10 that's on the web site, available to CLECs, is current
11 as of today.
12 Q.   And that -- and what was the date of that
13 CGI spec? Is that the one contained in your testimony?
14 A.   No, it is not the one contained in my
15 testimony. It was created after that. I believe that
16 specification is dated April the 22nd or so, but I'm
17 not positive on that date. There is one version later
18 than what's contained in my testimony.
19 Q.   You said that -- you claim it was updated
20 on April twenty --
21 A.   Second, as best -- I'm doing this from
22 memory. I don't have that document in front of me.
23 Q.   But then your testimony on April 9th said
24 it was current -- well, never mind.
25 A.   We're in the middle of -- when we filed the

1 Q.   And the CGI specification uses that
2 hypertext markup language?
3 A.   Yes, it does.
4 Q.   And that means that when you send a data
5 stream -- and correct my abuse of this technology --
6 but you send a data stream that will include both the
7 underlying data and the presentation data on; is that
8 correct?
9 A.   Yes, that is correct. The data stream
10 includes both the presentation information and the data
11 itself.
12 Q.   So it's really just the LENS screen, but in
13 a data format?
14 A.   It is the data format that the LENS screen
15 is created from. I turned your answer around, but yes.
16 Q.   And someone who is using the LENS CGI spec
17 cannot -- has to step through the same screens that's
18 in LENS, right?
19 A.   The same --
20 Q.   Sequence? The same data?
21 A.   Same sequence of data selections. I
22 wouldn't -- it's not through the same screens, but you
23 get the data in the same order; yes.
24 Q.   And so the user using CGI -- LENS CGI you
25 can't vary the way -- the order in which you obtain

1 testimony, it was in the middle of things.
2 Q.   But the LENS CGI spec dated December 15th,
3 1997, which you said is current, did not reflect the
4 LENS 2.0 or LENS 2.1 changes; is that correct?
5 A.   It does not reflect the changes that were
6 put into effect on March 16th. Those changes affect,
7 for a large part, the preordering section and a few
8 minor portions -- excuse me -- for a large part, the
9 ordering section and a few minor portions of the
10 preordering section.
11 Q.   You say 2.0. How about 2.1? It doesn't
12 reflect 2.1 either?
13 A.   Excuse me. I'm talking -- I was mixing
14 apples and oranges on the release. We call that
15 release 2.0. Today's version reflects 2.1, yes.
16 Q.   And I might be a little confused, but OBF
17 EDI 7.0 standards compliance, is that different than
18 2.0 or 2.1?
19 A.   That is contained as a subpart of both of
20 those.
21 Q.   I would like to now talk about the HTML
22 part of the CGI, well, the CGI spec. But you, I
23 believe, stated that -- we talked about HTML. right?
24 That's hypertext markup language?
25 A.   Yes, I did.

1 that data; is that correct?
2 A.   Well, you can -- no, that's not correct.
3 You can vary the order in the same manner that you can
4 vary it in LENS. But to that extent -- I'm saying that
5 backwards. There's a great deal of flexibility in how
6 you can obtain that information, but it's the same in
7 both the browser mode of LENS and the CGI mode of LENS.
8 Q.   Now, there is another way you can develop
9 CGI; is that correct?
10 A.   Yes, there is.
11 Q.   And is it true that in response to an AT&T
12 request around August of '96, BellSouth proposed a
13 white paper -- or submitted a white paper that proposed
14 developing a LENS CGI spec that did not use HTML?
15 A.   Subject to check, I'm aware there was such
16 a request in '96. I'm not aware that it was August.
17 That's fine.
18 Q.   But you agree with that, that that's what
19 happened?
20 A.   Yes, AT&T did make such a request. And
21 then we went off down the pathway of developing EC-Lite
22 specifically with AT&T and did that, in essence,
23 instead.
24 Q.   And without using HTML in a CGI spec, it
25 would give the user much more flexibility on how he

1 received the data?
2 A.   It would give the user different means of
3 obtaining the data. Not much more flexibility. I
4 can't agree with that.
5 Q.   And you eventually abandoned that -- or
6 decided not to implement a CGI spec that did not use
7 HTML in favor for one that did use HTML; is that
8 correct?
9 A.   That's correct. We had had those original
10 discussions with AT&T in late 1996. We then were
11 ordered, and agreed between the two companies, to
12 develop EC-Lite specifically for AT&T and launched off
13 on that development. We had no other party interested
14 in CGI, until the middle of 1997, and so we decided not
15 to develop a third interface, but to stick with the
16 LENS interface, its common gateway interface, and
17 EC-Lite as our preordering mechanisms.
18 Q.   Could you please turn to the South Carolina
19 order, paragraph 162?
20 A.   I'm sorry. Paragraph or page?
21 Q.   Paragraph.
22 A.   Yes, I have that.
23 Q.   And about halfway down that paragraph,
24 there's a statement that says, as MCI points out and
25 BellSouth acknowledges, this method would require a

1 that the underlying method is necessarily slower or
2 less efficient.
3 Q.   Well, let me ask you this: In their
4 discussion of integration, in the FCC's discussion of
5 integration, you talk about HTML and CGI. Is my
6 understanding correct that the LENS CGI spec is closer
7 to HTML parsing than the CGI discussed in the FCC
8 order?
9 A.   That is correct.
10 Q.   Okay. Let's talk about API now. I think
11 we talked about the architecture it used. Will the API
12 interface be integrated?
13 A.   It will not. It will be integratable. We
14 will be providing a demonstration or prototype
15 integrated interface for the CLEC system developers as
16 just an example, but the interface itself will not be
17 integrated.
18 Q.   By you could -- BellSouth could, if they
19 wanted to, offer an integrated interface; is that
20 correct?
21 A.   Well, we could and we couldn't. Let me
22 take that just a little further. I certainly --
23 Q.   I like that answer.
24 A.   I certainly could produce an interface that
25 integrated ordering and preordering functions. I

1 competing carrier to proceed through each LENS
2 presentation screens, just as a person using the system
3 would, rather than being able to use the data
4 independently of BellSouth screens, as with CGI.
5   And this paragraph is contained in the
6 discussion of the -- what was called HTML parson?
7 A.   Yes, it is.
8 Q.   Can you tell me, when they say
9 independently of BellSouth screens, as CGI, they're not
10 talking about CGI with HTML -- using HTML; is that
11 correct?
12 A.   No. They're talking about the version of
13 CGI that we declined to develop.
14 Q.   Okay. And didn't they -- is it your
15 understanding of this order that they did not approve
16 of a system that uses HTML because it would be slower
17 and less efficient?
18 A.   No, that's not my understanding. My
19 understanding is that they accepted MCI's comments that
20 it was slower and less efficient and that I failed to
21 provide sufficient proof in my affidavit that it was,
22 indeed, effective and efficient. And that's been the
23 substance of my discussions with them since that point
24 in time, that the burden of proof was on me to prove it
25 in this application and that I failed to prove it, not

1 cannot produce one that integrates with the CLECs'
2 sales and marketing or customer records databases.
3 That's something they have to do. So we do not plan to
4 produce an integrated solution using the API at the
5 moment.
6 Q.   Just a side issue: You had said that some
7 medium sized CLECs had approached BellSouth about using
8 API. Does BellSouth's own CLEC, for lack of a better
9 word, plan on using API?
10 A.   They have not officially approached me
11 about any of the interfaces, so I do not know what they
12 intend to use.
13 Q.   Officially? Is that different than
14 unofficially?
15 A.   Oh, I'm sorry. I mean, I don't have a --
16 they have attended several of our meetings. They
17 attended the meeting on the API, and they attended the
18 meeting on the EDI, but I do not have a sign-up
19 request, anything from them indicating what systems
20 they intend to use.
21 Q.   Would they have direct access to RNS or
22 SONGS?
23 A.   Absolutely not.
24 Q.   On page 11 --
25 A.   Of?

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(1) A. He gets the information we're providing to
(2) the CLECs plus his pricing.
(3) Q. So do you consider that --
(4) A. The pricing is -- we've held out and
(5) contested that it's marketing information.
(5) Q. Now, would you consider that to be -- and
(7) I'm going to use an acronym because I don't know if
(8) I'll be able to pull up what it stands for -- CPNI,
(9) Customer Proprietary Network Information.
(10) A. No. I don't think we consider pricing --
(11) and we're outside -- way on the edge of my knowledge
(12) here, I'll have to confess to the directors. We don't
(13) consider that CPNI.
(14) Q. Let me ask you a hypothetical. If there
(15) is CPNI, would a CLEC be entitled to all CPNI in a
(16) customer service record if the customer gives
(17) permission to the CLEC to obtain that?
(18) A. As a hypothetical, I believe that's
(19) correct. But as I indicated, we're past the edge of
(20) my -- I know there are a very detailed set of rules
(21) about CPNI, I'm not intimately familiar with them so I
(22) need to stop there. We're past the edge of what I
(23) know about them.
(24) Q. That's fair enough. I've been there
(25) myself. On parsing of CSRs, is there -- now, CSR

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(1) data, a lot of this data in the CSRs is also put into
(2) a service order; is that correct?
(3) A. Yes.
(4) Q. And EDI ordering interface requires CLECs
(5) to put in data in an OBF data element guidelines,
(6) within these guidelines to be a proper order?
(7) A. Yes, it does.
(8) Q. And if a CLEC currently cannot take data
(9) from the CSRs that are fed electronically to the CLEC
(10) and parse that into -- well, it doesn't come parsed so
(11) they can order it, they can submit it, input it
(12) directly into the service order; is that correct?
(13) A. That's partially correct. The data comes
(14) parsed in the form it is available to BellSouth, that
(15) is, it's broken out. For instance, as we saw
(16) yesterday, the listed name is in a separate field by
(17) itself which is last name, first name, middle initial.
(18) But that is not broken apart into three pieces. And
(19) in some cases, the OBF requirements differ from the
(20) way that BellSouth's record layout is available.
(21) Q. Now, can a BellSouth service
(22) representative using RNS populate a service order with
(23) CSR information?
(24) A. Yes, they can.
(25) Q. I would like to talk about PSIMS. I

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(1) apologize for not giving that acronym earlier when I
(2) used the term, but that's Product Services --
(3) A. Information Management System.
(4) Q. And on page 14, they talk about --
(5) A. Of?
(6) Q. Of your rebuttal testimony, talk about
(7) listing of all NXX for customers, NXX codes for
(8) customers?
(9) A. Yes.
(10) Q. Is that available through RNS?
(11) A. Is it available through RNS?
(12) Q. Can a BellSouth service representative
(13) using RNS, are they provided a list of NXX codes?
(14) A. Yes, they are.
(15) Q. For PIC searches and future searches, for
(16) both of those items, are there hundreds of entries
(17) that a CLEC would have to search for or could choose
(18) from?
(19) A. Yes, there are unless that CLEC happened
(20) to be an IXC.
(21) Q. I don't understand.
(22) A. Well, I would -- no. I'm sorry. I didn't
(23) mean to be flippant about that. We've assumed that
(24) most of the CLECs are affiliated with an IXC and that
(25) they would certainly know their own four-digit code.

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(1) But there are hundreds of codes available in each
(2) central office to be selected from.
(3) Q. For both PIC codes and for products and
(4) services?
(5) A. Products and services, that's correct.
(6) Q. And currently, neither one of those have a
(7) search capability through LENS; is that correct?
(8) A. That's correct, they do not through LENS.
(9) EC-Lite and CGI allow the CLEC to develop exactly that
(10) same search capability.
(11) Q. Let me ask you about that on the CGI. I
(12) believe you told me that with the CGI HGML and then
(13) you're provided a screen at a time; is that correct?
(14) A. Yes.
(15) Q. Now when you're doing a search for a PIC
(16) code or a product or a feature, the customer's on the
(17) line, aren't you presented with only a dozen or a
(18) limited number of choices at a time? You don't list
(19) all 300 on the same screen; is that correct?
(20) A. You list them in groups or categories by
(21) custom calling features as a group. There are a
(22) number of groups. And those groups are just a logical
(23) way of handling them. If you wanted to create a
(24) system using CGI that would let you retrieve and then
(25) go in a quick search fashion to any of those lists,

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(1) you would do what RNS does which is import the whole
(2) list, stick it over in a databases, and provide an
(3) algorithm on your side of the computer that searches
(4) it.
(5) Q.   But you are only presented --
     A.   No --
(7) Q.   -- you're only presented ten at a time; is
(8) that correct?
(9) A.   That's true, you are only presented ten
(10) PICs at a time. But there is a button and a call in
(11) CGI that gets the next ten. So you would instruct the
(12) computer to go through all -- get all available PIC
(13) codes in the office as part of the background and
(14) processing that's happening on an order. And having
(15) gotten all of those available PIC codes, it would then
(16) let the rep search for them interactively. Or you
(17) could do as I believe ATT has done and obtain all of
(18) that information as a download and load them directly
(19) into your own computer system.
(20) Q.   But doing it through LENS, you would have
(21) to get 30 screens, go through 30 screens and then have
(22) a search feature of those 30 screens; is that correct?
(23) A.   Yes, you would, again, if you're talking
(24) about doing it in the manual mode in LENS. If you do
(25) it in CGI, the computer does go through 30 retrievals

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(1) to get all the PIC codes if there are 300.
(2) Q.   You would have to program it to go through
(3) 30 different screens?
(4) A.   Yes.
(5) Q.   Now, is a PIC a required field in a
(6) service order?
(7) A.   Yes, it is. Well, most service orders.
(8) Q.   And if you make a mistake on the PIC, the
(9) customer will be slammed; is that correct?
(10) A.   Yes.
(11) Q.   And do you think that a search tool would
(12) reduce the chance of unintentional slamming?
(13) A.   Again, I guess the contention is a
(14) business question there. A search tool would
(15) certainly enable the CLEC to find other codes faster.
(16) Since most of the CLECs use a particular interexchange
(17) carrier as their affiliate, the need for that seems to
(18) us somewhat overstated. But it's available if you
(19) want to develop it.
(20) Q.   Well, I'm sure every CLEC that's an IXC
(21) would love the customer to also be their long distance
(22) carrier, but that's not a guarantee, is it?
(23) A.   No, it's not.
(24) Q.   Mr. Stacy, I would like to switch gears
(25) from preordering and move on to ordering. And what

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(1) Mr. Lamoureux is passing out are some excerpts from
(2) the ATT-BellSouth interconnection agreement.
(3)   MR. HOPKINS: I would like to mark
(4) that as Exhibit No. 35.
(5)   CHAIRMAN GREER: Would you identify
(6) the document for us?
(7)   MR. HOPKINS: This is an excerpt
(8) from the ATT interconnection agreement with
(9) BellSouth.
(10)   THE WITNESS: And I apologize not
(11) having seen this, but I am curious from some language
(12) on the first page if this is the Tennessee agreement
(13) or if this is the Georgia agreement?
(14)   MR. HOPKINS: Tennessee. At the
(15) bottom you can see it's marked "TN2/24/97."
(16)   CHAIRMAN GREER: Are there any
(17) objections?
(18)   MR. ELLENBERG: No.
(19)   CHAIRMAN GREER: If not, so ordered.
(20) Exhibit No. 35.
(21)   (Exhibit 35 marked.)
(22) BY MR. HOPKINS:
(23) Q.   Now, under ordering for 28.1.2.2, could
(24) you please read the last sentence?
(25) A.   Yes, I have it here. "By December 15,

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(1) 1996, all local services shall be available for
(2) ordering via EDI interface."
(3) Q.   Now, isn't it true that all local services
(4) are not available for ordering via the EDI interface?
(5) A.   That is true. The local services that are
(6) available for ordering are the services that BellSouth
(7) can order electronically.
(8) Q.   Well, let's talk about resale for a
(9) moment. You say that through EDI you can only order
(10) fully electronically for a full electronic
(11) flow-through only simple services; is that correct?
(12) A.   With full electronic flow-through, that's
(13) correct. Only -- there's a group of 30 categories of
(14) so-called "simple services."
(15) Q.   And then there are four so-called "complex
(16) services" that you can submit an order, but it doesn't
(17) get processed electronically; is that correct?
(18) A.   That's correct. And then there are three
(19) unbundled network elements.
(20) Q.   Now, you state on page 26 of your rebuttal
(21) testimony that BellSouth does not provide on-line
(22) electronic ordering for many complex services; is that
(23) correct?
(24) A.   I'm sorry. Let me find that. Yes, I see
(25) that.

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CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY: CHRISTINA MEZA, RPR

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(1) contained in that RSAG database?

(2) A. What I can describe is what was responsive

(3) to MCI's proposal. MCI asked for the ability to

(4) download all of the information they needed to

(5) validate addresses within BellSouth's systems. And

(6) those extracts are what is responsive to that

(7) specific request. I did not go through the rest of

(8) the database and determine what data – other than

(9) some specific examples, what data was not being

(10) requested.

(11) Q. Are you aware, Mr. Stacy, that the

(12) interconnection agreement between MCI and BellSouth

(13) in Tennessee provides that within 30 days after the

(14) effective date of this agreement BellSouth shall

(15) provide to MCI the SAG data or its equivalent in

(16) electronic form?

(17) A. Yes, I am.

(18) Q. And are you aware that there is a

(19) comparable provision in the ATT agreement which

(20) requires BellSouth to provide ATT with a download of

(21) the RSAG database or its equivalent?

(22) A. I'm not – I've read the wording in the MCI

(23) agreement recently. I've not read the wording in the

(24) ATT agreement, but – so I will have to accept that,

(25) subject to check.

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(1) I think the key word there is exactly what

(2) you said is in the ATT agreement is or equivalent.

(3) And electronic access to the database is equivalent.

(4) In addition, the wording in the contract is somewhat

(5) ambivalent because it talks about a street address

(6) guide. We don't have one of those.

(7) So granted our contract was not very

(8) specific, nor was your request very specific. What

(9) we provide is electronic access to RSAG through LENS

(10) and EC-Lite and the CGI interface to LENS.

(11) Q. Is another reason that BellSouth has given

(12) that providing a download of the RSAG database to MCI

(13) doesn't make sense is that the information would

(14) always be out of date?

(15) A. Yes. It would be 24 hours out of date.

(16) That's a technical issue that we certainly don't know

(17) how to solve.

(18) Q. Would you agree to me – agree that to the

(19) extent one is looking to validate addresses that the

(20) address information in RSAG does not undergo

(21) wholesale changes on a daily basis?

(22) A. No, I would not agree with that. There are

(23) literally thousands of changes to that database all

(24) day long every day. The most common change is not –

(25) as you indicated, is not whether the address is

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(1) valid. Once they're in there, they tend to stay

(2) there. The most common change is that the status of

(3) the facilities changes. A person moves out of the

(4) house, a person moves into the house, and now the

(5) "quickserve" indicator is different, and that

(6) changes thousands of times a day.

(7) Q. But with respect to the basic address

(8) information, that doesn't change? If 460 James

(9) Robertson Parkway is a valid address today, it's

(10) likely to be a valid address tomorrow?

(11) A. It's likely to be a valid address

(12) tomorrow. What you're losing is the other useful

(13) pieces of information that relate to the status of

(14) facilities.

(15) Q. And to the extent that MCI has made a

(16) business judgment that it is more useful for them to

(17) have the download and have that information a day out

(18) of date and to have access through LENS, you're

(19) essentially refusing to honor that judgment?

(20) A. No. No. No. If you send me a response

(21) back to the bona fide request, which we have answered

(22) sometime late last year, I have a team of developers

(23) that will be assigned to provide MCI with a download

(24) of the extract of the RSAG databases necessary for

(25) them to validate the addresses. All we have to do is

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(1) sign that contract. We made a formal offer of

(2) response to you about the pricing and the terms and

(3) conditions for doing that.

(4) Q. MCI did not submit a BFR to you, though,

(5) did they?

(6) A. To the best of my knowledge, they did

(7) submit a BFR. Either verbally or through Mr. Green's

(8) request in a hearing, we created a BFR and responded

(9) to MCI's request.

(10) Q. Let me ask for a minute about viewing a

(11) customer service record through LENS. LENS provides

(12) access only to the first 54 pages of a customer

(13) service record; is that correct?

(14) A. That's not quite correct. It provides the

(15) access to the first 54 pages in each section. In

(16) some of the business records like the one we looked

(17) at earlier there are as many as seven sections, and

(18) you can see 54 pages in each one of those.

(19) Q. To the extent there's a larger customer

(20) service record, that is not available for a CLEC to

(21) view through LENS? It has to order a paper copy of

(22) that; is that correct?

(23) A. That's correct.

(24) Q. Does a BellSouth representative using RNS

(25) or SONGS have access to the complete customer service

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(1) record?

(2) A. They have access to it. They have the same

(3) 54-page limit in both cases without turning it into

(4) printed form.

(5) Q. Can they print it right there at their

(6) site?

(7) A. They can print it near their site,

(8) certainly.

(9) Q. And when a CLEC requested it, it has to be

(10) printed at BellSouth and faxed or overnighted or got

(11) to the CLEC by some other means; is that correct?

(12) A. That's correct.

(13) Q. Now, there is no access through LENS to

(14) customer payment history except in the state of

(15) Florida; is that correct?

(16) A. I believe that's correct. There is a

(17) question about what – in my mind about whether –

(18) what we've done in Alabama, but that's – it is in a

(19) specific state.

(20) Q. All right. And the lack of that access is

(21) not a technical limitation, it's a policy limitation;

(22) is that correct?

(23) A. It's a policy limitation in the sense that

(24) BellSouth was ordered to provide certain information

(25) as part of the arbitration agreement originally and

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(1) then the – we provided that in a subsequent

(2) agreement added customer credit history. So in that

(3) sense it's not a technical limitation. It is a

(4) decision on the part of BellSouth.

(5) Q. All right. I believe you told Director

(6) Malone earlier that you didn't believe there was any

(7) decision in Tennessee that required Bell to provide

(8) that type of information to CLECs; is that correct?

(9) A. To the best of my knowledge there is not.

(10) Q. Are you familiar with the provisions of the

(11) MCIMetro-BellSouth interconnection agreement relating

(12) to subscriber payment history?

(13) A. I am not.

(14) Q. Would it surprise you to learn that that

(15) interconnection agreement requires BellSouth to

(16) provide information on unpaid balances whether the

(17) applicant is delinquent, length of service with the

(18) prior local or intraLATA toll provider, whether

(19) service was suspended, and the requirement for an

(20) amount of deposit by any prior provider?

(21) A. Would it surprise me? Yes, it would. I

(22) have not had that given to me by – as a requirement

(23) for interface in Tennessee.

(24) MR. MELSON: Directors, I

(25) apologize. I did not make multiple copies of this.

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(1) BY MR. MELSON:
(2) Q. Mr. Stacy, let me show you page 8 of
(3) Attachment 8 of the MCIMetro-BellSouth Tennessee
(4) interconnection agreement and ask you if you can
(5) simply verify that Section 2.1.5 of that agreement
(6) requires the type of customer payment history
(7) information that we have just discussed?
(8) A. Okay. Again, it appears to me -- and I
(9) will assume this is the agreement for purposes of
(10) that -- that section of the agreement does require
(11) BellSouth to make available unpaid balance,
(12) delinquency, length of service with local or
(13) interLATA toll provider, and two other provisions.
(14) It does not indicate in that section the extent that
(15) that information is made available electronically or
(16) manually.
(17) Q. Do you know whether BellSouth makes that
(18) information available to MCI today?
(19) A. No, we do not make it available
(20) electronically. I do not know if we make it
(21) available manually.
(22) Q. I believe we looked at some printouts of
(23) LENS CSR this morning with Mr. Hopkins, and I believe
(24) we learned that those do not display the prices for
(25) the individual services; is that correct?

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(1) A. That is correct.
(2) Q. And, again, that is a policy decision by
(3) BellSouth rather than a technical limitation; is that
(4) correct?
(5) A. I'm -- again, I'm not sure I would
(6) characterize it as policy. That's a business
(7) decision of BellSouth, not a technical limitation.
(8) Q. And, in fact, when LENS was first released
(9) it did include that pricing information in the view
(10) of the customer service record; is that correct?
(11) A. For -- yes, it did for some period of time.
(12) Q. Now, you stated this morning that BellSouth
(13) regards that as marketing information, and let me
(14) turn you to page 22 of your rebuttal testimony, if
(15) you would please. And beginning really down at line
(16) 25 you state, do you not, that that information is
(17) proprietary because it reflects BellSouth's internal
(18) analysis of its customer's needs from a marketing
(19) perspective?
(20) A. Yes, that's -- that is the statement.
(21) Q. How does the listing of a price next to a
(22) service that a customer has ordered involve any
(23) analysis by BellSouth of that customer's needs?
(24) A. BellSouth sold those customers to -- excuse
(25) me -- sold those services to a customer at retail

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(1) originally based on a sales contact where a great
(2) deal of exploration of the customer's needs and
(3) requirements was done, and the total price of that
(4) package was negotiated with the customer as far as
(5) what items they wanted and what items they could
(6) afford.
(7) So the package that the customer has is
(8) based on our internal analysis, our marketing
(9) analysis of what we thought we could sell them that
(10) matched their needs. What we did sell them that
(11) matched their needs I guess is the end result.
(12) Q. And yet the information on what you could
(13) sell them that matched their needs is available even
(14) from the CSR that does not reflect the prices; is
(15) that correct?
(16) A. Yes, it is. We were --
(17) MR. ELLENBERG: Mr. Chairman, I
(18) don't see any new information being elicited with
(19) these questions here.
(20) DIRECTOR MALONE: I overrule this
(21) objection. I want to see where Mr. Melson is going.
(22) I'm interested in this. I don't think it was
(23) explored fully at the last line of questioning.
(24) CHAIRMAN GREER: Carry on.
(25) THE WITNESS: Would you repeat

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(1) that, please?
(2) BY MR. MELSON:
(3) Q. If I can remember it. You indicate to the
(4) extent there was an analysis of what services the
(5) customer needed or desired, that information is
(6) available from the version of the CSR that does not
(7) include the prices; is that correct?
(8) A. That's true.
(9) Q. And the pricing information I believe you
(10) told us earlier is available in BellSouth's tariffs?
(11) A. That's correct.
(12) Q. If each of the piece -- each of the parts
(13) of that collection of information is publicly
(14) available, how is it that the combination of that
(15) information can be proprietary?
(16) A. The -- the answer is making the combination
(17) available is what's considered proprietary to
(18) BellSouth. It's -- BellSouth has assembled the data
(19) in a format at its retail unit level and used it for
(20) marketing purposes. Providing that data to the CLEC
(21) was argued in a number of states and the prices were
(22) argued as marketing data, and we were successful in
(23) upholding BellSouth's business decision in a number
(24) of states.
(25) DIRECTOR MALONE: What do you

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(1) mean when you say assembled? I understand from
(2) Mr. Melson's question that the services provided that
(3) customer are actually provided?
(4) THE WITNESS: They're actually
(5) listed on the CSR, yes, sir.
(6) DIRECTOR MALONE: And you say --
(7) what do you mean when you say assembled? They are
(8) assembled by BellSouth in an obviously what you're
(9) describing now is a proprietary/marketing manner.
(10) What do you mean by assembled?
(11) THE WITNESS: The list of
(12) services and equipment for the customers and the
(13) prices for those services and equipment exist in two
(14) different parts of the billing database. To create a
(15) customer service record with those on them and to
(16) make it easy for a BellSouth retail representative to
(17) use and to sell products and services to a customer,
(18) those two pieces of data, the service and the price
(19) -- the offered price for the service are assembled
(20) together.
(21) The CLEC's cost for the service
(22) is related to that price; but how the CLECs choose to
(23) package those services together, whether to offer
(24) them at part of the retail discount or to package
(25) them in some way and put together a wholesale -- a

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(1) price for the customer, the CLEC's price that they
(2) are going to offer their customer is impacted by
(3) those numbers certainly, but it's not directly
(4) calculated off those numbers.
(5) So our argument has been that
(6) this is BellSouth marketing data. These are
(7) BellSouth's retail prices. There's a cost order that
(8) tells you how to convert those into wholesale costs,
(9) but they are BellSouth's retail prices used for
(10) BellSouth's marketing, and furnishing them to the
(11) CLECs to make it easier for them to market to the
(12) customers by having a direct comparison in front of
(13) them is simply a business decision that we were not
(14) willing to make.
(15) DIRECTOR MALONE: Does the
(16) customer have an interest here? From Exhibit 29
(17) submitted by NEXTLINK, it seems to suggest that the
(18) customer was requesting to have his or her private
(19) BellSouth customer services record released. And
(20) does the customer have an interest here?
(21) THE WITNESS: Yes, the customer
(22) does have an interest certainly in knowing exactly
(23) what products and services they are obtaining from
(24) BellSouth today. And that's what we furnish in the
(25) CSR. The customer has an interest in knowing what

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(1) price MCI or NEXTLINK would charge them to package up
(2) exactly that same set of services and in balancing
(3) that price against the BellSouth price that they are
(4) currently paying BellSouth.
(5) But that's a marketing function
(6) when they start balancing one company's offer against
(7) another company's offer, and that's the -- that's the
(8) basic reason that data is not produced.
(9) BY MR. MELSON:
(10) Q. Mr. Stacy, just one more question on this
(11) line. I believe you told Mr. Campen this morning
(12) that in calculating the wholesale discount, marketing
(13) costs were treated as avoided or avoidable and that
(14) was another reason that this type of marketing
(15) information should not be available.
(16) A. That's my understanding of marketing
(17) information in general, yes.
(18) Q. Okay. Were any costs associated with the
(19) maintenance of this portion of the customer service
(20) record excluded when you calculated the wholesale
(21) discount?
(22) A. I -- I am not familiar if these were
(23) specifically entered in that calculation or not or
(24) how that was arrived at in Tennessee. It's a very
(25) complex calculation, I know.

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(1) DIRECTOR MALONE: Is that part
(2) and parcel of the refusal to release the information?
(3) THE WITNESS: No, sir. I was
(4) actually using it as an example. This is marketing
(5) information. I was merely stating -- you know, we
(6) tried to go back through and take out marketing data
(7) and marketing functions just as a general category.
(8) BY MR. MELSON:
(9) Q. Mr. Stacy, let me talk to you just briefly
(10) about telephone number selection. When a CLEC wants
(11) to select a telephone number for a new installation
(12) for a residential customer, it goes in LENS to the
(13) separate telephone number selection screen; is that
(14) correct?
A. Yes, it does.
(16) Q. And in a comparable situation if a
(17) BellSouth representative was using RNS, RNS
(18) automatically displays a number for the customer
(19) service representative to offer up without the
(20) necessity of moving to a separate screen and taking a
(21) separate step; is that correct?
(22) A. Not exactly. The RNS rep has to move to a
(23) separate screen. When they move to that screen, the
(24) RNS system is designed so that it requests a
(25) telephone number when that screen is opened and that

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(1) exact same capability is available to the CLECs using
(2) the CGI interface.
(3) Q. That exact same capability is not available
(4) to a CLEC using the browser interface?
(5) A. It is not.
(6) Q. In fact, turn, if you would, to page 18 of
(7) your testimony where you described this.
(8) A. Rebuttal?
(9) Q. Yes, sir. Let me ask just a foundation
(10) question. Is the browser interface to LENS a piece
(11) of presentation software?
(12) A. Yes, it is.
(13) Q. All right. Would you read for me, please,
(14) lines 22 through 24 on page 18.
(15) A. "BellSouth has developed presentation
(16) software for RNS which places a request to the
(17) telephone number database when a customer contact is
(18) initiated that is likely to require a new telephone
(19) number. CLECs could develop" -- I'm sorry. Through
(20) line 24. Stop there?
(21) Q. Yes. Now, if I read that sentence a little
(22) differently and read BellSouth has developed
(23) presentation software for LENS which does not place a
(24) request to the telephone number database when a
(25) customer contact is initiated that is likely to

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(1) require a new telephone number, that would also be a
(2) true statement; would it not?
(3) A. That would be a true statement. BellSouth
(4) did not make that customer contact decision on behalf
(5) of the CLECs. We left the LENS browser mode open for
(6) individual requests. If the CLEC wants a
(7) presentation system that will automatically place a
(8) request, they will have to develop it themselves.
(9) Q. I believe you told Mr. Hopkins earlier
(10) today that LENS does not display a list of available
(11) NXXs for a particular customer location; do you
(12) recall that?
(13) A. That's correct. It does not.
(14) Q. I don't believe he asked you the second
(15) piece. Isn't it true that RNS and SONGS do display
(16) such a list of available NXXs?
(17) A. Yes, it is. RNS and SONGS obtain that data
(18) from an update from the local exchange routing guide
(19) as I've mentioned elsewhere in my testimony, and they
(20) choose to display it to the service reps at that
(21) point.
(22) Q. Isn't it true that LENS can only be used to
(23) reserve six telephone numbers at a time?
(24) A. Six numbers per transaction, 12 numbers per
(25) session, yes.

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(1) Q. What do you mean -- explain to me how 12
(2) numbers can be selected during a single session.
(3) What does that mean?
(4) A. I go through and select -- I can initially
(5) log in to LENS, go through and select six numbers,
(6) reserve those, return to the reservation screen, and
(7) select six more for a total of 12. At that point I
(8) will have to initiate a new session before I can
(9) select additional numbers.
(10) Q. And to initiate a new session means to log
(11) off and log back on?
(12) A. Or to start another log on. You don't have
(13) to log off, actually.
(14) Q. So that -- let me ask this: Is there any
(15) comparable limit on the ability of a BellSouth
(16) representative using RNS or SONGS to reserve
(17) telephone numbers?
(18) A. There's not a directly comparable limit nor
(19) is there a limit for the CLECs using EC-Lite.
(20) Q. And the CLECs using EC-Lite, who are those
(21) again?
(22) A. ATT at the moment.
(23) Q. And EC-Lite is not an industry standard
(24) interface; is that correct?
(25) A. It is not, nor is LENS.

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(1) Q. Turn to page 52, please, of your rebuttal
(2) testimony at line 21. You are responding there to
(3) criticism by Mr. Green that a CLEC cannot access
(4) preorder information on DID number blocks and DID
(5) trunks through LENS; is that correct?
(6) A. Yes.
(7) Q. And your answer states that DID numbers and
(8) trunks are contained in ATLAS which is the telephone
(9) number database and which is accessed by EC-Lite and
(10) LENS; do you see that?
(11) A. Yes.
(12) Q. Does LENS permit you to -- LENS does access
(13) ATLAS. Does it permit you to access DID numbers and
(14) trunks in ATLAS?
(15) A. LENS does not permit you to access DID
(16) numbers and trunks -- well, trunks are not in ATLAS.
(17) It doesn't permit you to access DID numbers. EC-Lite
(18) does.
(19) Q. So to the extent that that sentence might
(20) be read to imply that LENS provided access to DID
(21) numbers, that was not your intent in writing that?
(22) A. No, and let me clarify that because that is
(23) awkwardly worded. Blocks of DID numbers cannot be
(24) obtained and reserved through LENS. Single DID
(25) numbers can be accessed, and there's a technical

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(1) difference between the two interfaces.
(2) Q. And typically DID numbers are ordered in
(3) blocks?
(4) A. In blocks of some size, yes.
(5) Q. In fact, the minimum block is probably
(6) about 20, isn't it?
(7) A. No. The minimum block is probably ten.
(8) Q. All right. You talked this morning I
(9) believe with both Mr. Campen and Mr. Hopkins about
(10) calculating due dates. Could you turn to Exhibit
(11) GC-13 to the direct testimony of Ms. Calhoun that you
(12) adopted?
(13) A. Yes.
(14) Q. Is that an example of the installation
(15) calendar that a CLEC using the browser mode of LENS
(16) would see?
(17) A. Yes, it is.
(18) Q. I would like to ask you just quickly, if
(19) you could, to walk through an example to show me how
(20) a CLEC representative would use this information to
(21) calculate a due date.
(22) Let me give you a couple of assumptions.
(23) Let me ask you to assume that today is Thursday,
(24) October 16th. And I checked the '97 calendar, and I
(25) matched the date and the day of the week correctly

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(1) for you.
(2) A. Okay.
(3) Q. Assume that I've got a residential customer
(4) on the line with me who wants to install two new
(5) lines. What date can I quote as a due date?
(6) A. Today is Thursday, October the 16th. Has
(7) the customer ever had service at that location before
(8) or not?
(9) Q. Yes.
(10) A. They have had service. You look in the
(11) interval table, the residence interval is two days.
(12) You begin with Friday in the work schedule. Saturday
(13) and Sunday are not available. So the second workday
(14) is Monday the 20th. You look at the calendar and
(15) determine whether Monday the 20th is open for
(16) installation. It's closed. Tuesday the 21st is
(17) closed. Wednesday the 23rd is open. Wednesday the
(18) 23rd would be the offered due date for the customer.
(19) Q. And to do that you essentially had to look
(20) at information in three different segments of this
(21) screen and walk through and put it together?
(22) A. Yes.
(23) Q. And the – I'm curious, the dates closed
(24) down at the bottom, they're not in chronological
(25) order, are they?

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(1) A. They are not.
(2) Q. Okay. Now, turn back to Exhibit GC-11. Is
(3) that the due date screen that a BellSouth
(4) representative using RNS would see in a similar
(5) situation?
(6) A. Yes, it is.
(7) Q. And in this situation this – and this has
(8) got April instead of October on it. But wouldn't
(9) simply the next available date that could be quoted
(10) be highlighted in green on that calendar in the upper
(11) left-hand corner?
(12) A. Yes, it would be highlighted in green, and
(13) the closed dates would be blacked out.
(14) Q. So, in essence, there the presentation
(15) software is doing for the BellSouth representative
(16) something that the LENS presentation software does
(17) not do for the CLEC representative?
(18) A. That is correct.
(19) Q. LENS provides a list of the various
(20) services and features that can be ordered for resale;
(21) is that correct?
(22) A. Yes, it does.
(23) Q. And is that a complete list of everything
(24) that is potentially available for resale?
(25) A. No. It is a list of the features and

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(1) services available in that specific central office.
(2) So it's not anything that's available for resale.
(3) Q. Okay. Let me ask you this. Is it
(4) everything that's available for resale in that
(5) central office?
(6) A. No. It's the list that our representatives
(7) use. It's everything that's available in the PSIMS
(8) and the COFFI databases. But there are other
(9) services that are available for resale in the central
(10) office. Many of the more complex services are not
(11) listed in that database.
(12) Q. LENS does not show any promotions that
(13) might be currently in effect; is that correct?
(14) A. To the best of my knowledge, it does not.
(15) That date is posted to the Web site, but it's not
(16) shown in LENS.
(17) Q. It is shown to a BellSouth representative
(18) using RNS; is that correct?
(19) A. Yes. Those are marketing promotions.
(20) Q. In response to a question by Mr. Campen, I
(21) believe you described what an USOC is, a universal
(22) service order code. Can you tell me what a FID is,
(23) F-I-D?
(24) CHAIRMAN GREER: Let's stop for
(25) just a second. You seem to be changing subjects just

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(1) a little.
(2) MR. MELSON: Yes, sir.
(3) CHAIRMAN GREER: I've got to
(4) change court reporters. Let's take a five-minute
(5) break and you can come back and ask your questions.
(6)
(7) (Recess taken at 3:59 p.m.
(8) Conclusion of Volume IV D.)

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1 Q.   Are USOCs displayed on the LENS features
2 and services screens?
3 A.   Yes, they are.
  Q.   And what about the associated FIDs?
  A.   The FIDs are not displayed on the feature
6 and service screens.
7 Q.   When Mr. Hopkins asked you a question
8 about using LENS in browser mode to select a long
9 distance carrier, I believe you indicated there's
10 about 30 pages of that information that is essentially
11 not in alphabetical order. Is that a fair summary of
12 what you said?
13 A.   A summary of what I said, the 30 pages was
14 an assumption that there were -- there are about ten
15 carriers displayed on each page. The assumption was
16 that there were 300 valid carriers in that office.
17 Q.   All right. So if a customer calls MCI and
18 says, I'd like to use MCI for local service, but I
19 just came from California and, gosh, I love U.S. West,
20 and if they're available I want to use them as my long
21 distance carrier, a CLEC customer service
22 representative would have to go through up to 30 pages
23 of information to determine whether U.S. West is
24 available?
25 A.   That's correct. That information is

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1 presented in a random fashion, which is the way it's
2 presented to BellSouth's reps, and there is not a
3 search tool in the browser mode.
4 Q.   In RNS there is a search tool for the
5 BellSouth representative; is that correct?
6 A.   There is in RNS. There is not such a
7 search tool in either DOE or SONGS, which are used by
8 the business reps.
9 Q.   Now, at one point BellSouth stated that it
10 intended to provide a search function in LENS; is that
11 correct?
12 A.   Yes. That was discussed either late last
13 year or early this year. We did a feasibility study
14 on providing such a search function in LENS and still
15 have that feasibility study but have not provided the
16 feature yet.
17   We ran into a software problem. We would
18 have to provide a version of LENS that required the
19 addition of software that would handle the Java
20 interface. And in the process of turning up some of
21 our CLECs, we found we had a number of smaller
22 customers who had old hardware and software that
23 didn't support that interface. And so, at the moment,
24 that plan is temporarily on the shelf.
25 Q.   Isn't Java supported by Version 3 and

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1 above of Netscape and by Version 3 and above of the
2 Internet Explorer browsers?
3 A.   I believe that's correct. It certainly is
4 not supported by 2.0 in either case, but I believe 3.0
5 and above are supported.
6 Q.   So, essentially, then is it my
7 understanding the reason you're not making this
8 available is that there are some CLECs still using
9 Version 2.0 of Netscape or Internet Explorer?
10 A.   And have hardware that will not support
11 3.0 and higher.
12 Q.   What type of notification have you done or
13 survey have you done to determine whether they are
14 willing to upgrade to get this capability?
15 A.   We have not done a survey yet. We will be
16 starting one very shortly, because this capability, I
17 believe, is part of a recent Georgia order. And so we
18 will have to go to the customers and do such a survey
19 and determine if they want that capability and what
20 hardware problems it's going to cause for them. It
21 has not been done yet.
22 Q.   And, Mr. Stacy, isn't it true that the use
23 of Java is only one programming approach that might be
24 available to BellSouth to provide the search
25 capability? Couldn't the same thing be done in Perl

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1 or C++ or a number of other programming languages?
2 A.   It could be done, but not to the LENS
3 interface. The interface to LENS is set up by
4 definition as a browser, and those browsers -- well,
5 let me back up.
6   Yes, there are a number of ways it could
7 be done. We could not find a way other than Java that
8 was universally distributable. And that created
9 problems for some customers, so we stopped that
10 development temporarily. We'll now have to go back
11 and restart it.
12 Q.   When a BellSouth customer service
13 representative is creating an order in the BellSouth
14 system, is information on the taxing jurisdictions in
15 which a particular address is located included in RNS
16 and SONGS?
17 A.   (Pause)
18 Q.   Let me be a little more specific.
19 A.   Okay. I'm sorry.
20 Q.   If the customer says, My address is 460
21 Fifth Avenue, do RNS and SONGS access a database that
22 says, well, that's within the city limits of Nashville
23 so it's subject to a city tax, it is not subject to a
24 county tax?
25 A.   Yes, with an explanation. BellSouth as a

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1 comment. RNS looks a lot like this. Do you recall
2 that comment?
3 A.   Yes, I do.
   Q.   Have you demonstrated RNS to this
   Authority?
6 A.   I have not personally. I do not know
7 whether the staff has seen -- or the Authority has
8 seen a demonstration of RNS outside of these
9 proceedings.
10 Q.   You certainly have not demonstrated it to
11 the Authority in the confines of this proceeding?
12 A.   No, I have not.
13 Q.   All right. And do I understand that you
14 expect the Regulatory Authority to make a
15 determination that BellSouth provides functionality in
16 substantially the same time and manner without seeing
17 the systems that BellSouth uses itself?
18 A.   Our request at the moment is that they
19 make that decision based on the filed testimony, yes.
20 Q.   You also stated while you had this
21 prototype demonstration up on the screen that you've
22 determined you need to give the CLECs a little more
23 instruction. Do you recall that?
24 A.   Yes, I do.
25 Q.   MCI has requested a data dictionary;

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1 again, the information that is available today has
2 been available in essentially the same form, with
3 changes and corrections, but in essentially the same
4 form since July of last year.
5   And what I'm trying to do is encourage the
6 CLECs to use that information that's available to go
7 ahead and develop the interface.
8 Q.   I believe you told Mr. Hopkins that there
9 were four complex services that could be ordered
10 through EDI but that orders were not generated
11 mechanically for those services; is that correct?
12 A.   That is correct.
13 Q.   Are BellSouth's retail orders for those
14 services generated mechanically?
15 A.   BellSouth's retail orders for those
16 services are originated manually and then generated
17 mechanically, which is essentially the same thing that
18 happens to the CLECs. The CLECs submit it
19 electronically. It's then generated manually and
20 finally entered in electronic form.
21   So it's two ways of getting to the same
22 end result, except that the CLECs can transmit the
23 order electronically, where BellSouth's sales account
24 representatives actually send in a paper form to start
25 the process.

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1 correct?
2 A.   Yes, they have.
3 Q.   MCI has requested a CSR design layout
4 record; correct?
5 A.   Yes, they have.
6 Q.   We've requested a download of RSAG; is
7 that correct?
8 A.   Yes, you have.
9 Q.   And we've requested development of the
10 EDI, all those letters, PCP/IP SSL3 interface; is that
11 correct?
12 A.   Yes, that's correct.
13 Q.   Instead of giving us a demonstration of
14 how we might do something, why don't you just give us
15 what we ask for, Mr. Stacy?
16 A.   Well, it's a pretty simple answer. You
17 have also asked for and said, We can't develop CGI
18 because we don't have enough information. What I
19 developed and demonstrated was intended to be
20 responsive to that request to allow to you begin using
21 CGI.
22 Q.   And the results of that effort, you're
23 saying, will be made available to us at some point in
24 the future?
25 A.   Yes, very quickly. The information --

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1 Q.   Are you familiar with the term "split
2 order"?
3 A.   In general, but -- well, you'll have to be
4 more specific.
5 Q.   Okay. Let me define it as a situation
6 where an existing customer has, for example, ten local
7 lines and the customer decides he's going to try a
8 CLEC, such as MCI, for half of those lines, and MCI
9 enters an order to resell five of those lines to the
10 customer.
11 A.   Yes, I am familiar with that type of
12 order.
13 Q.   Is it correct that a resale order in that
14 split-order situation does not flow through?
15 A.   That's correct, it does not. It falls out
16 for manual attention. We've determined that there are
17 too many chances for error on the CLEC side to let
18 those orders flow through.
19   We have a trained representative make sure
20 that the split is properly done and that all the
21 features and services follow the proper line.
22 Q.   Is it correct that an order for local
23 number portability does not flow through?
24 A.   Local number portability doesn't exist in
25 BellSouth's region today, so there are no orders for

1 Q.   So that whatever time the U.S. Mail takes.
2 there could be a period of several days in which a
3 CLEC will not know that it has lost a customer; is
4 that correct?
5 A.   I believe that's correct. I'm not
6 entirely familiar with that process. just in the
7 general sense.
8 Q.   Okay. Would you agree with me that there
9 are no loss notifications when a customer who was
10 served by UNEs leaves the CLEC?
11 A.   I'm having to think about that one. A
12 customer who was served by UNEs leaves the CLEC. I
13 simply don't know. I don't know if there's a loss
14 notification created in that process or not.
15 Q.   Would you agree with me that there's no
16 loss notification for items that are ordered by
17 circuit number rather than by telephone number?
18 A.   I don't know.
19 Q.   Would you agree with me that there's no
20 loss notification for partial disconnects?
21 A.   Again. I don't know. We're further down
22 in that process than I'm familiar with.
23 Q.   If a BellSouth customer service
24 representative gets a call from a customer about a
25 pending order, does the BellSouth representative have

1 information as to the availability of facilities to
2 serve the customer?
3 A.   Yes.
4 Q.   In an analogous situation where a CLEC is
5 dealing with its customer. it contacts first a
6 BellSouth Account Team. and that BellSouth Account
7 Team. in turn. contacts the internal point of contact;
8 is that correct?
9 A.   That's correct.
10 Q.   So is it fair to say that there is an
11 additional layer between the end-user customer and the
12 people actually answering the service order inquiry in
13 the situation where a CLEC is involved?
14 A.   Yes. it's fair to say that the process is
15 different but similar.
16 Q.   I believe you described this morning that
17 the EDI ordering interface has been through a 6.0. a
18 6.1. and a 7.0 since sometime last year. Am I
19 remembering that about right?
20 A.   Those numbers aren't exactly right. but
21 three releases since December of '96.
22 Q.   All right. What is BellSouth's policy on
23 supporting prior releases of an interface once there
24 has been an update to it?
25 A.   Our current policy is that we will provide

1 the ability to call up that order as it exists in the
2 Bell systems and to give the customer information
3 about the order status?
4 A.   Yes. they do.
5 Q.   And isn't it true that neither EDI nor
6 LENS provides a similar capability to a CLEC?
7 A.   No. that's not true. LENS provides
8 exactly that same capability to a CLEC to retrieve and
9 look at a pending order. both to look at the status
10 and to supplement the order. EDI does not provide
11 that capability. you're correct.
12 Q.   And. again. it is EDI. not LENS. that you
13 are relying on for nondiscriminatory ordering and
14 provisioning?
15 A.   Yes. we are. that's correct.
16 Q.   Regarding the ordering of complex
17 services. one of the first steps when an order for
18 complex service is placed with BellSouth is to perform
19 what's known as a service inquiry; is that correct?
20 A.   Yes. in general.
21 Q.   And that essentially involves the
22 BellSouth Account Team that -- let me take the retail
23 situation. The BellSouth Account Team that interfaces
24 with the retail customer goes internally to a
25 specified contact point in BellSouth to get

1 approximately six months' notification to the EDI
2 users. and then that after the update we will provide
3 90 days of support for one release backwards. and then
4 we'll discontinue support for that release.
5 Q.   So that would be similar to the situation
6 when Microsoft moved from Windows 3.1 to Windows 95
7 saying. We will support Windows 3.1 for another 60
8 days and then you're on your own? Or. no. then we --
9 strike it. That's not a good analogy.
10   One last short line of questions. Could
11 you turn to your Exhibit WNS-OSS-2. attached to your
12 rebuttal.
13 A.   Yes.
14 Q.   And that is a letter from an outside
15 consultant saying. essentially. that their work was
16 done and that the Local Carrier Service Centers are
17 operational and ready to handle BellSouth's customers'
18 request for service; is that correct?
19 A.   Yes. that is what that letter indicates.
20 Q.   Then it goes on and cites tangible
21 improvements that have been made. including
22 improvements in processing time. improvements in
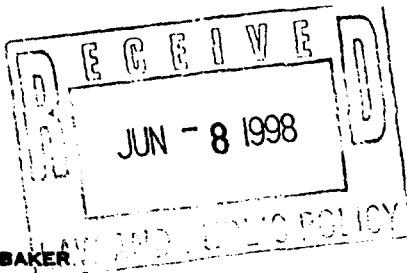23 overall productivity. et cetera; is that correct?
24 A.   That's correct.
25 Q.   There's nothing in this exhibit that tells

ATTACHMENT 4

COMMISSIONERS:

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Docket No. 8354-U

ORDER ADOPTING OSS REPORT

In re: Investigation into Development of Electronic Interfaces for BellSouth's Operations Support Systems

Record Submitted: March 20, 1998   Date Decided: April 21, 1998

APPEARANCES

On behalf of the Commission Staff:
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BY THE COMMISSION:

The Georgia Public Service Commission ("Commission") issues this Order regarding the operations support systems ("OSS") of BellSouth Telecommunications, Inc. ("BellSouth"). The Commission established this case to discuss and propose any necessary enhancements to BellSouth's operations support systems which will aid entry by competitive local exchange companies ("CLECs") into the local market, and to ensure that the systems meet the spirit and the intent of the Telecommunications Act of 1996.

In its October 30, 1997 Order in Docket No. 7253-U, the Commission directed the Staff to conduct a Technical Workshop and to subsequently submit a report to the Commission.[1] The Staff submitted the report on December 23, 1997 as directed by the Commission. BellSouth and intervenors expressed their positions regarding the Staff Report. As a result, the Commission decided to hold a hearing to determine whether to adopt the Staff Report, which was presented as GPSC Staff Exhibit 1 in the hearing, and attached as Appendix A to this Order.

I. JURISDICTION AND BACKGROUND

The federal Telecommunications Act of 1996, which amended the Communications Act of 1934, imposes various duties on incumbent local exchange

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[1] GPSC Docket No. 7253-U relates to the Commission's review of BellSouth's Statement of Generally Available Terms and Conditions pursuant to Section 252(f) of the Telecommunications Act of 1996. The Commission affirmed its directive, and made explicit reference to this docket, in its January 15, 1998 Order Regarding Revised Statement, Docket No. 7253-U, at p. 29 & n. 36.

companies ("LECs") to enable new competitors to enter the local market without necessarily having to build redundant physical networks. These duties include, among other things, the duties to provide new entrants with access to unbundled elements of the incumbents' networks, and to offer to new entrants at wholesale rates any telecommunications service provided by the incumbents on a retail basis. *See* 47 U.S.C. § 251(c)(3), (4).

Pursuant to Section 251 of the Act, 47 U.S.C. § 251, the Federal Communications Commission ("FCC") evaluated operations support systems in its *Local Competition First Report and Order*.[2] The FCC determined that, because OSS includes the information necessary to obtain other network elements or resold services, providing access to OSS functions falls squarely within an incumbent LEC's duty under Section 251(c)(3) to provide unbundled network elements under terms and conditions that are nondiscriminatory and just and reasonable, and its duty under Section 251(c)(4) to offer resale services without imposing any limitations or conditions that are discriminatory or unreasonable. The FCC additionally identified OSS itself as a network element and stated that it consists of five functions: (1) pre-ordering; (2) ordering; (3) provisioning; (4) maintenance and repair; and (5) billing.[3] For purposes of this docket, this Commission has considered some provisioning issues under the topic of ordering; other provisioning issues have been addressed in the Commission's separate proceeding on performance measurements, GPSC Docket No. 7892-U.

An incumbent LEC such as BellSouth uses OSS to provide services to its end user (retail) customers. The term OSS refers to the computer systems, databases, and personnel functions that incumbent LECs use for many internal operations necessary to provide service. Competitive LECs ("CLECs") must be able to access the incumbent's OSS in various ways. For example, CLECs must be able to access data necessary to sign up customers, to place orders for services or facilities provided by the incumbent, track the progress of that order to completion, receive relevant billing information from the incumbent, and obtain prompt repair and maintenance for the elements and services they obtain from the incumbent. CLECs must also be able to obtain the information and training necessary to make effective use of their access to the incumbents' OSS.

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2 *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, CC Docket No. 96-98, First Report and Order, 11 FCC Rcd 15499 ("*Local Competition First Report and Order*"), *aff'd in part and vacated in part sub nom. Competitive Telecommunications Ass'n v. FCC*, 117 F.3d 1068 (8th Cir. 1997) and *Iowa Utilities Bd. v. FCC*, 120 F.3d 753 (8th Cir. 1997), *writ of mandamus issued sub nom. Iowa Utilities Bd. v. FCC*, No. 96-3321 (8th Cir. Jan. 22, 1998), *petition for cert. granted*, Nos. 97-826, 97-829, 97-830, 97-831, 97-1075, 97-1087, 97-1099, and 97-1141 (U.S. Jan. 26, 1998) (collectively, *Iowa Utils. Bd.*), Order on Reconsideration, 11 FCC Rcd 13042 (1996), Second Order on Reconsideration, 11 FCC Rcd 19738 (1996), Third Order on Reconsideration and Further Notice of Proposed Rulemaking, FCC 97-295 (rel. Aug. 18, 1997), *further recons. pending*.
3 *Local Competition First Report and Order*, 11 FCC Rcd at 15660-61, 15763, ¶¶ 316, 516-17; 47 C.F.R. § 51.319(f). The Eighth Circuit Court of Appeals upheld the FCC's determination that OSS is an unbundled network element. *Iowa Utilities Bd.*, 120 F.3d at 809.

The OSS functions include functions provided by the incumbent's databases, computer systems, and personnel. The databases contain information, such as the types of telecommunications services available to customers, address validation, telephone number availability, available dates for service installation, and other information necessary to formulate and process a customer's order for service. Various systems and databases have also been developed to resolve customer complaints about service, to handle maintenance and repair, and to ensure accurate and timely billing.

Georgia's Telecommunications and Competition Development Act of 1995 was a precursor to the federal requirements, and it also mandated opening the local exchange markets to competition with obligations imposed upon the incumbent LECs. Thus the Commission's actions in this docket also serve to meet relevant requirements in the Georgia Act. For example, all LECs must permit reasonable interconnection with other LECs; and this includes all or portions of such services as needed to provide local exchange services. O.C.G.A § 46-5-164(a). Such interconnection services shall be provided for intrastate services on an unbundled basis similar to that required by the FCC[4] for services under the FCC's jurisdiction. O.C.G.A § 46-5-164(d). Once the Commission has authorized resale of services (as in the case of BellSouth in Docket No. 6352-U), the Commission shall determine the reasonable conditions such that no LEC or telecommunications company gains an unfair market position. O.C.G.A § 46-5-164(e). The Commission has the authority to require LECs to provide additional interconnection services and unbundling. O.C.G.A § 46-5-164(g).

As evidenced in previous proceedings before this Commission,[5] BellSouth has already made progress in developing electronic interfaces for CLECs to access its OSS. The Commission recognizes that this is a substantial and evolutionary undertaking that is vital to the development of competition in Georgia's local exchange market. The Commission has not limited itself to a strict analysis or application of the so-called "parity" requirements of Sections 251 and 271 of the federal Act. The Commission does not intend that its decision in this docket be rigidly applied as part of any determination whether BellSouth has met particular requirements of Sections 251 and 271. Instead, the Commission in this docket has focused upon the practical aspects of meeting the spirit and intent of the Act in general, and in particular the identification of any necessary enhancements to BellSouth's OSS which will aid entry by CLECs into the local market.

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4 The Commission notes that the FCC has established a proceeding that includes OSS issues, *In the Matter of Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance*, CC Docket No. 98-56, RM-9101. The FCC recently issued a Notice of Proposed Rulemaking in that proceeding (adopted April 16, 1998, released April 17, 1998).

5 *See* GPSC Docket No. 6352-U (discounts for resale of BellSouth services), wherein the parties and the Commission initially addressed electronic interfaces for access to OSS relevant to resale; and the consolidated Dockets No. 6863-U/7253-U (relating to BellSouth's potential application for Section 271 interLATA authority, and BellSouth's Statement of Generally Available Terms and Conditions, respectively). *See also* GPSC Docket No. 7061-U (setting cost-based rates for BellSouth's interconnection and unbundled network elements and related items, including use of OSS), and Docket No. 7892-U (regarding performance measurements for BellSouth).

II. STATEMENT OF PROCEEDINGS

The Commission established this proceeding by its October 30, 1997 Interim Order in Docket No. 7253-U. The Staff issued the first Notice of Technical Workshop Schedule on November 14, 1997, which was sent by first-class mail and where possible by facsimile to the parties in GPSC Dockets No. 6863-U/7253-U (Section 271 & SGAT), 7061-U (interconnection and unbundled network elements cost proceeding), and 7892-U (performance standards docket). The schedule set November 20, 1997 as the date for technical comments by companies such as CLECs having an interest in using BellSouth's electronic interfaces in Georgia; December 2, 1997 as the date for BellSouth's response; and December 9-10 as the dates for the Technical Workshop.

The following parties filed comments on November 20, 1997: American Communications Services, Inc. ("ACSI"), AT&T Communications of the Southern States, Inc. ("AT&T"), Intermedia Communications, Inc. ("ICI"), LCI International Telecom Corp. and its affiliates ("LCI"), MCI Telecommunications, Inc. ("MCI"), and Sprint Communications Company, L.P. ("Sprint"). On December 2, 1997, BellSouth filed a set of responses to the technical issues raised in the prefiled comments. On December 4, 1997, the Staff issued a detailed Agenda Notice for the Technical Workshop with an attached Matrix summarizing the technical issues raised in the prefiled comments. This Agenda Notice with Matrix was sent to those parties who prefiled comments and intervention notices in this docket, and to all persons who received the original Notice of the Technical Workshop. The workshop was held on December 9-10, 1997, in the hearing room of the Commission's offices, Room 507-II, at 47 Trinity Avenue in Atlanta.

The Staff prepared a Matrix of the technical issues based upon the prefiled comments, and this Matrix formed the foundation and format for the workshop discussions, proposed solutions, and proposed implementation dates. The Matrix grouped the issues into the following five topic categories:

Topic Number 1:   Pre-Ordering
Topic Number 2:   Maintenance and Repair
Topic Number 3:   Ordering & Provisioning
Topic Number 4:   Billing
Topic Number 5:   General (including provision of information
                   and training)

The Staff subsequently filed its Report regarding the OSS Technical Workshop on December 23, 1997, including in the Matrix format both proposed solutions and implementation time frames for the issues within these five topics. As part of the recommendations contained in the Report, the Staff requested that the Commission consider accepting the Staff Report and its proposed procedures at its Administrative Session on January 20, 1998. Pursuant to the recommended procedures, BellSouth filed its responses to the Report on January 9, 1998, agreeing with many of the

recommendations but disagreeing or offering different implementation deadlines as to other aspects of the solutions proposed in the Staff Report. BellSouth filed a revised response on January 14, 1998. AT&T filed a response to the Staff Report on January 13, 1998. On January 20, 1998, the Commission considered the Staff Report along with the comments filed by BellSouth and AT&T, and decided to establish a date for comments from other interested parties. Pursuant to the Commission's Order setting January 27, 1998 as a date for objections to the Staff Report, additional responses were filed on that date by ACSI, BellSouth, Intermedia, MCI, and Sprint.

On February 6, 1998, the Commission issued a Procedural and Scheduling Order establishing a hearing process through which to resolve certain matters pertaining to the provision by BellSouth of access to its Operations Support System for CLECs, and specifically, whether to adopt the recommendations presented in the Staff Report. The Commission also ordered that a pre-hearing conference be conducted by Hearing Officer Philip J. Smith of the Commission Staff on February 13, 1998 in the Commission's hearing room. The purpose of the pre-hearing conference was to determine whether the number of issues identified by the Commission Staff in its Report could be pared.

Pursuant to the Commission's directive, the Hearing Officer conducted the pre-hearing conference and filed the results on February 16, 1998. The following parties were recognized as having intervened: ACSI, AT&T, BellSouth, the Consumers' Utility Counsel Division of the Governor's Office of Consumer Affairs ("CUC"), ICI, LCI, Low Tech Designs, Inc. ("LTD"), MCI, MGC Communications ("MGC"), NEXTLink, Powertel, and Sprint. The Commission Staff also participated in the case, including the pre-hearing conference.

The pre-hearing conference showed that most of the issues identified by the Commission Staff, and the solutions and implementation time frames proposed by the Commission Staff, remained as issues for at least some of the parties. Some of the parties at the pre-hearing conference indicated dissatisfaction with the proposed solutions recommended by the Staff or with the alternative solutions, where applicable, proposed by BellSouth. No party objected to this scope of the issues for the hearings scheduled March 18-19, 1998.

On March 5, 1998, the Commission issued a Supplemental Procedural and Scheduling Order altering the schedule to include two additional days of March 20 and 23, 1998. The hearing was held March 18-20, 1998. Briefs were filed by the Commission Staff and the parties on March 30, 1998.

III. DISCUSSION OF THE ITEMS BELLSOUTH CHALLENGED

The Commission Staff presented the Staff Report and testified that the recommendations contained therein were based upon industry consensus where possible. Where there was no apparent consensus, the Staff developed reasonable compromises based upon the Staff's professional judgment, taking into account the comments and

information submitted by the parties.[6] The Staff expressed strong belief that the Report is accurate and correct and will aid CLEC entry into the local market.

BellSouth raised objections to certain proposed solutions as recommended by the Commission Staff in its report filed December 23, 1997. These will be discussed in turn in the following sections. For each of these items, the "potential issue" identified in the Commission Staff's Report (Appendix A hereto) is shown along with the accompanying proposed solution from the Staff Report, followed by a brief discussion.

A. Pre-Ordering

The pre-ordering OSS function allows a CLEC to gather and confirm information necessary to place an accurate order for its end use customer. In general, pre-ordering consists of several functions including street address validation, telephone number reservation, feature availability, service availability, due date information, and customer service records. Like BellSouth, many CLECs retrieve pre-ordering information from BellSouth's databases while a customer is on the line. Therefore timely access to pre-ordering information is critical to a CLEC's ability to enter and compete in the local exchange market. Similarly, the CLEC must be able to incorporate the relevant pre-ordering information into an order both quickly and accurately.

Item 1.d.
Issue: Human to machine interface requires dual entry of information.
Solution: Proposed API interface will alleviate many of these problems.

BellSouth provides a proprietary terminal-type interface called Local Exchange Navigation System ("LENS"), and offers it as a system predominantly for access to pre-ordering OSS functions.[7] LENS also includes ordering functions, but these functions are less well developed. LENS is a Graphic User Interface or "GUI"-based[8] interface that allows a CLEC to use a browser software program to retrieve information from a BellSouth server on a real-time basis. Competing carriers can connect to LENS through dedicated local area network (LAN-to-LAN) connections, through dial-up connections, or through the public Internet.

Much attention has been focused on further development of Electronic Data Interchange or "EDI"-based[9] interfaces. BellSouth offers EDI as a system predominantly

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6 Staff Direct at 8.

7 BellSouth witness Stacy, Tr. 87; BellSouth Brief at 2.

8 GUI-based interfaces are widely recognized as much easier for people to use because they employ graphics (*e.g.*, icons) rather than relying solely upon rote usage of typed verbal commands. Virtually all modern software programs, especially for consumers and small business users, are GUI-based.

9 The EDI standard is defined by the Telecommunications Industry Forum. *See Local Competition First Report and Order*, 11 FCC Rcd at 15761, ¶ 513, n. 1238.

for access to ordering OSS functions.[10]   This has engendered contention between BellSouth and CLECs who argue, among other things, that BellSouth has not done enough to provide a seamless interface that minimizes human intervention for pre-ordering and ordering functions. For example, CLECs must "cut and paste" information from LENS (a pre-ordering interface) to EDI (an ordering interface), while BellSouth is able to automatically bring up a Customer Service Record ("CSR"), and the CSR information is populated into the order.[11]   Integration of the pre-ordering functions with the ordering functions of either BellSouth's or the CLEC's OSS is important because it minimizes manual processes that add costs, delays, and errors.[12]

The Staff determined and stated in the Staff Report that the Application Program Interface ("API"), as presented and discussed by BellSouth and the other parties at the Technical Workshop, is a start in the right direction to resolving the human to machine interface problem. API will enable greater integration of the pre-ordering and ordering functions. A lack of integration engenders errors, is costly, and ultimately affects the end user customers. An integrated pre-ordering/ordering system eliminates the need for re-keying information, so that whichever company uses it - BellSouth for its internal ("legacy") systems, or CLECs for the new interfaces - can enter information once and then transfer the information electronically from one system to another.

BellSouth's proposed API Gateway will provide a pre-ordering interface and an ordering interface, which will both be machine-to-machine, use a common protocol, and therefore will be easily integrated with the CLECs' own OSS. Among the benefits of API will be less .eed for dual entry of information into the systems. The current need for dual entry, and hence the additional human intervention, also results in unduly high fallout rates in which orders are not accurately processed. Based upon the comments and information provided by the parties, the Staff stated that the proposed API interface will alleviate many of the problems indicated by the parties.[13]

BellSouth's objection was that other methods are already available for CLECs to integrate pre-ordering and ordering functionality, and to integrate this functionality with their own customer service and billing records, eliminating any need for dual entry of data. For example, BellSouth provided an updated CGI-LENS[14] specification (Stacy's Ex. WNS-1) to MCI on December 15, 1997.[15]   BellSouth also made EC-Lite, a machine-to-machine pre-ordering interface, available on December 30, 1997. According to

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10 BellSouth witness Stacy, Tr. 87; BellSouth Brief at 2. For interested CLECs, BellSouth has made available the EDI-PC Harbinger software and training manual, as one way to use an EDI interface on a personal computer ("PC") system. BellSouth also offers the Exchange Access Control and Tracking ("EXACT") interface as a system primarily for ordering functions.
11   See Sprint Comments, November 21, 1997; and Sprint Comments Regarding Staff Report, January 27, 1998.
12   Tr. 545.
13   Commission Staff testimony at 7-8; Commission Staff Ex. 1 (Matrix p. 1).
14   The term "CGI-LENS" refers to BellSouth's Common Gateway Interface ("CGI") to its Local Exchange Navigation System ("LENS"). Stacy Direct at 10.
15   Stacy Direct at 4-5.